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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RICHARD L. WILLEY, JR.,

Plaintiff,

vs.

BMW OF NORTH AMERICA, LLC,  
BAYERISCHE MOTOREN WERKE AG, and  
WUTHRICH BMW LLC,

Defendants.

Case No.: 2:24-cv-00467-JCM-EJY

**STIPULATION TO EXTEND TIME FOR  
PLAINTIFF TO RESPOND TO  
DEFENDANT BAYERISCHE  
MOTOREN WERKE AG'S MOTION TO  
DISMISS FOR LACK OF PERSONAL  
JURISDICTION  
(First Request)**

The parties, through their respective undersigned counsel and pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule IA 6-1, hereby stipulate to a fourteen-day extension of time for Plaintiff to respond to Defendant Bayerische Motoren Werke AG's Motion to Dismiss for Lack of Personal Jurisdiction (ECF No. 19), filed on March 19, 2024. Plaintiff's current deadline to respond is April 2, 2024. The parties therefore stipulate to extend the response deadline to April 16, 2024. This is the first request to extend this deadline. There is currently no hearing scheduled on this motion.

This is a complex product liability action arising out of injuries Plaintiff alleges he suffered while driving a 2001 BMW 325Ci. Through the instant lawsuit, Plaintiff sues Defendant, Bayerische Motoren Werke AG ("BMW AG"), for its role in allegedly designing, manufacturing, and producing the subject BMW vehicle in a defective condition. On March 19,



2024, BMW AG appeared in this case and filed a motion to dismiss for lack of personal jurisdiction. (ECF No. 19.) Plaintiff needs additional time to marshal jurisdictional evidence to oppose BMW AG's motion and to prepare his response brief. The parties therefore stipulate to a fourteen-day extension—or until April 16, 2024—for Plaintiff to respond to the motion.

**IT IS THEREFORE STIPULATED AND AGREED** that Plaintiff, RICHARD L. WILLEY, JR., shall have until April 16, 2024 to respond to Defendant Bayerische Motoren Werke AG's Motion to Dismiss for Lack of Personal Jurisdiction. Defendant Bayerische Motoren Werke AG shall then have until April 30, 2024 to file its reply.

Dated: March 25, 2024

/s/ Gregory A. Kraemer

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and Bayerische Motoren Werke AG*

**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

DATED: March 26, 2024